

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**St. Mary Parish Government  
St Mary Parish Government - Harold J "Babe" Landry Landfill  
Berwick, St. Mary Parish, Louisiana  
Agency Interest Number: 9340  
Activity Number: PER20070002  
Proposed Permit Number: 2660-00071-V0**

**I. APPLICANT**

**Company:**

St Mary Parish Government - Harold J "Babe" Landry Landfill  
Fifth Floor Courthouse Bldg  
Franklin, Louisiana 70538

**Facility:**

St Mary Parish Government  
752 Thorguson Drive  
Berwick, St. Mary Parish, Louisiana  
Latitude 29° 40' 51.27", Longitude 91° 14' 03.53"

**II. FACILITY AND CURRENT PERMIT STATUS**

The Harold J. "Babe" Landry Landfill (Facility) is an industrial/municipal/C&D solid waste disposal facility owned and operated by the St. Mary Parish Government (Parish). It is not a manufacturing process. It does not, therefore, consume raw materials or produce a product. The Facility receives a variety of non-hazardous solid waste (mostly municipal waste) that is disposed of by landfilling. The landfill is supported by a variety of operations and maintenance-related activities, including operation and maintenance of mobile equipment and other non-mobile equipment powered by internal combustion engines, handling and storage of leachate removed from the landfill prior to disposal and storage of diesel fuel.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application was submitted on November 9, 2007 requesting a Part 70 operating permit for the Harold J. "Babe" Landry Landfill. Additional information dated February 11, 2009 and February 18, 2009 was also received.

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**Project**

The Harold J. "Babe" Landry Landfill is a Type I/II/III solid waste landfill owned and operated by the St. Mary Parish Government. Type I/II operations are authorized under Solid Waste Standard Permit No. P-0193R1, while Type III operations are authorized under Solid Waste Standard Permit No. P-0316.

**Proposed Permit**

Permit 2660-00071-V0 will be the initial Part 70 operating permit for the Harold J. "Babe" Landry Landfill.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	-	10.16	+10.16
SO <sub>2</sub>	-	0.11	+0.11
NO <sub>x</sub>	-	1.23	+1.23
CO	-	11.06	+11.06
VOC	-	7.51	+7.51
Chapter 51 Toxic Air Pollutants (TAPs)	-	5.088	+5.088

**IV. REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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**Applicability and Exemptions of Selected Subject Items**

<b>XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source</b>		
<b>ID No:</b>	<b>Description</b>	<b>Requirement</b>
UNF01	Entire Facility	NESHAP Subpart AAAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills [40 CFR 63.1930]
		40 CFR 68 – Chemical Accident Prevention Provision
		40 CFR 82 – Protection of Stratospheric Ozone
		Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.Chapter 51]
		Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5901]]
ARE03	Fugitive Landfill Gas Emissions	NESHAP Subpart AAAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills [40 CFR 63.1930]
		<b>Notes</b>
		DOES NOT APPLY. Facility has estimated uncontrolled emissions less than 50 megagrams per year (Mg/yr) NMOC.
		DOES NOT APPLY. The facility does not have more than the threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115.
		DOES NOT APPLY. There are no applicable CFC chillers/coolers onsite.
		EXEMPT. Facility is not a major source of TAPs emitting less than 10 tons per year of any toxic air pollutant listed in LAC 33:III.5112. Table 51.1 or 25 tons per year or more of any combination of toxic air pollutants listed in LAC 33:III.5112, Table 51.1.
		DOES NOT APPLY. A risk management plan is not required at this time since the threshold for a regulated substance is not exceeded.
		DOES NOT APPLY. Facility has estimated uncontrolled emissions less than 50 megagrams per year (Mg/yr) NMOC.

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<b>XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source</b>			
<b>ID No:</b>	<b>Description</b>	<b>Requirement</b>	<b>Notes</b>
EQT01	P-1- Portable Diesel Water Pump	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	DOES NOT APPLY. Single point sources emit or have the potential to emit less than 5 tons per year of sulfur dioxide into the atmosphere.
EQT02	P-2-Portable Diesel Water Pump		
EQT03	P-3-Portable Diesel Water Pump		
EQT04	P-4-Portable Diesel Water Pump		
EQT05	P-5-Portable Gas Water Pump		
EQT06	P-6- Portable Gas Water Pump		
EQT07	G-1 Portable Gas Generator		
EQT03	P-3-Portable Diesel Water Pump	NSPS Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [40 CFR 60.4200]	DOES NOT APPLY. Pumps were constructed prior to April 1, 2006.
EQT04	P-4-Portable Diesel Water Pump		
EQT05	P-5-Portable Gas Water Pump	NSPS Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230]	DOES NOT APPLY. Pumps and generator were constructed prior to June 12, 2006.
EQT06	P-6-Portable Gas Water Pump		
EQT07	G-1-Portable Gas Generator		

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**Prevention of Significant Deterioration/Nonattainment Review**

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) regulations do not apply.

**Streamlined Equipment Leak Monitoring Program**

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Harold J. "Babe" Landry Landfill	None	-	-

**MACT Requirements**

The facility is not a major source of Toxic Air Pollutants pursuant to LAC 33:III.Chapter 51.

**Air Quality Analysis**

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

**General Condition XVII Activities**

None.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

There is no permit shield requested in this permit action according to LAC 33:III.507.I.

**VI. PERIODIC MONITORING**

Annual monitoring of the nonmethane organic compounds emission rate will be required to determine applicability of 40 CFR 60. Subpart WWW—Standards of

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Performance for Municipal Solid Waste Landfills as specified by 40 CFR.752(b)(1)(ii).

Federal regulation 40 CFR 64 – Compliance Assurance Monitoring is not applicable to this facility.

## **VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

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Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.